

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,
PALMER LUCKEY,
and FACEBOOK, INC.

Defendants.

CIVIL CASE NO. 3:14-cv-01849-P

**PLAINTIFFS' APPENDIX TO THEIR MOTION TO COMPEL PRODUCTION OF
DOCUMENTS AND TESTIMONY FROM OTHER PENDING LITIGATIONS**

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>PAGE(S)</u>
Docket - <i>Oculu, LLC v. Oculus VR, Inc. et al.</i> , No. 8:14-cv-00196-DOC-JPR (C.D. Cal.)	1	1-23
Complaint - <i>Oculu, LLC v. Oculus VR, Inc. et al.</i> , No. 8:14-cv-00196-DOC-JPR (C.D. Cal.), Dkt. No. 1	2	24-48
Docket - <i>Total Recall Technologies v. Oculus VR, Inc. and Palmer Luckey</i> , No. 3:15-cv-02281 (N.D. Cal.)	3	49-53
Complaint - <i>Total Recall Technologies v. Oculus VR, Inc. and Palmer Luckey</i> , No. 3:15-cv-02281 (N.D. Cal.), Dkt. No. 1	4	54-63
ZeniMax Media Inc. and id Software LLC's Third Set of Requests for Production to Defendants (dated April 23, 2015)	5	64-71
Defendants Oculus VR, LLC, Palmer Luckey and Facebook Inc.'s Objections and Responses to ZeniMax Media Inc. and id Software LLC's Third Set of Requests for Production (dated May 26, 2015)	6	72-101
Letter from K. Hemr to M. Rhodes and R. Smith regarding Defendants' Responses to Plaintiffs' Third Set of Requests for Production (dated June 24, 2015)	7	102-105

Letter from H. Keefe to K. Hemr regarding Defendants'
Responses to Plaintiffs' Third Set of Requests For Production 8 106-108
(dated June 30, 2015)

Dated: July 2, 2015

Respectfully submitted,

P. ANTHONY SAMMI
E-mail: Anthony.Sammi@skadden.com
KURT WM. HEMR
E-mail: Kurt.Hemr@skadden.com
JAMES Y. PAK
Texas State Bar No. 24086376
E-mail: James.Pak@skadden.com
KRISTEN VOORHEES
E-mail: Kristen.Voorhees@skadden.com
DEVIN A. KOTHARI
E-mail: Devin.Kothari@skadden.com
(the foregoing attorneys admitted *pro hac vice*)
**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**
Four Times Square
New York, New York 10036
Telephone No.: 212-735-3000
Facsimile No.: 212-735-2000

s/ Phillip B. Philbin
PHILLIP B. PHILBIN
Texas State Bar No. 15909020
E-mail: phillip.philbin@haynesboone.com
MICHAEL D. KARSON
Texas State Bar No. 24090198
E-mail: michael.karson@haynesboone.com
HAYNES AND BOONE LLP
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
Telephone No.: 214-651-5000
Facsimile No.: 214-651-5940

Attorneys for Plaintiffs
ZeniMax Media Inc. and id Software LLC

CERTIFICATE OF SERVICE

On July 2, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: July 2, 2015

s/ Phillip B. Philbin

Phillip B. Philbin